

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA	*	CRIMINAL NO. 11-023
v.	*	SECTION: "F"
MICHAEL SIDNEY WOOTON	*	VIOLATION: 18 U.S.C. § 1341 18 U.S.C. § 2

* * *

FACTUAL BASIS

Should this matter have gone to trial, the government would have proved through the introduction of competent testimony and admissible tangible exhibits, including documentary evidence, the following to support the allegations charged by the government in the one count bill of information now pending against the defendant, **MICHAEL SIDNEY WOOTON**.

MICHAEL SIDNEY WOOTON, who holds a Master's of Business Administration (MBA) degree from the University of New Orleans (UNO) was employed as a stock broker at Western International Securities, a California company with offices throughout the United States. **WOOTON** was employed in the New Orleans, Louisiana office, within the Eastern District of Louisiana. After Hurricane Katrina, **WOOTON** began to experience financial shortages resulting from renovations to his home damaged in the storm, private school tuition and other obligations.

Starting in 2006 and continuing through January 2010, **WOOTON** falsely represented to the fourteen clients listed below that he was investing their money in bonds, which would produce an annual yield of 15% - 20%. **WOOTON**, in truth and in fact either placed his client's funds in high risk "options" investments, or simply stole the funds for his personal use.

In order to execute his scheme and artifice to defraud, **WOOTON** created false account statements made to appear to be legitimate W.I.S. statements, which showed a monthly profit and growth of the funds initially invested with **WOOTON**. These statements were fraudulent, as in reality **WOOTON** either stole the money belonging to his clients or put the money in higher risk investments. **WOOTON** placed these fraudulent statements in the United States mail in order to further his scheme and artifice to defraud his clients. The amount **WOOTON** stole does not exceed \$913,773.00 from the fourteen clients from 2006 to January 2010, as detailed below.

	VICTIM	LOSS
1.	CD	\$32,000.00
2.	DD	\$133,000.00
3.	MD	\$33,605.00
4.	PF	\$13,800.00
5.	DL	\$90,288.00
6.	JJL	\$1,810.00
7.	CM	\$72,195.00
8.	EP	\$4,100.00
9.	P and BT	\$17,500.00
10.	CW	\$19,280.00
11.	C2W	\$67,790.00
12.	JW	\$16,045.00

13.	PW	\$289,000.00
14.	BH	\$123,360.00
TOTAL		\$913,773.00

All of these facts would be proved by the testimony of agents of the Federal Bureau of Investigation, as well as documentary evidence from businesses and financial institutions in the Eastern District of Louisiana.

MICHAEL SYDNEY WOOTON
Defendant

Date

SAMUEL SCILLITANI, ESQUIRE
Counsel for Defendant

Date

CARTER K. D. GUICE, JR.
Assistant United States Attorney

Date